



<b>Return</b>		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
<b>Certification</b>		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 65%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

**ATTACHMENT A**  
***Persons to be searched***

The search of Hussein A. Haji (HAJI), D.O.B. (11/18/2001) bodily substances, specifically, saliva, that may constitute evidence of the commission of a crime.

**ATTACHMENT B**  
***Property to be seized***

The property to be seized is saliva containing epithelial cells by buccal swab.

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*

Hussein A. Haji, D.O.B. (11/18/2001)

Case No. 23-898M(NJ)

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

Hussein A. Haji, D.O.B. (11/18/2001)

located in the Eastern District of Wisconsin, there is now concealed *(identify the person or describe the property to be seized)*:

Hussein A. Haji, D.O.B. (11/18/2001)

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1951(a)	Hobbs Act Robbery
18 U.S.C. § 924(c)	Brandishing a Firearm during a Crime of Violence

The application is based on these facts:

See Attached Affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days *(give exact ending date if more than 30 days: \_\_\_\_\_)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

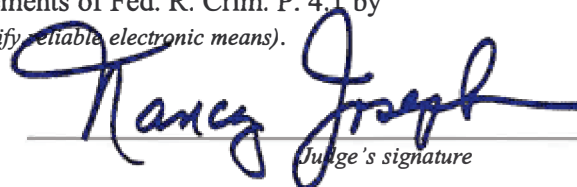

*Applicant's signature*

Heather Wright, Special Agent, FBI

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
\_\_\_\_\_ *(specify reliable electronic means)*.

Date: 4/20/2023


*Judge's signature*

City and state: Milwaukee, WI

Honorable Nancy Joseph, U.S. Magistrate Judge

*Printed name and title*

## **AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Heather Wright, being first duly sworn, hereby depose and state as follows:

### **A. BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since July of 2010. Since August of 2020, I have been assigned to the FBI's Milwaukee Area Violent Crimes Task Force, a multi-jurisdictional law enforcement entity charged with investigating violations of federal law, including bank robberies, commercial robberies, armed motor vehicle robberies, and other violent crime matters, defined under Title 18 of the United States Code. I have been trained in a variety of investigative and legal matters, including the topics of Fourth Amendment searches, the drafting of search warrant affidavits, and probable cause. I have participated in criminal investigations, surveillance, search warrants, interviews, and debriefs of arrested subjects. As a result of this training and investigative experience, I have learned how and why violent actors typically conduct various aspects of their criminal activities.

2. I am currently engaged in the investigation of HUSSEIN A. HAJI (XX/XX/2001) for violations of Title 18 U.S.C. § 1951(a), Hobbs Act Robbery, and Title 18 U.S.C. § 924(c), Brandishing of a Firearm during a Crime of Violence. The investigation to date has determined that HAJI robbed a United States Post Office mail carrier on or about December 7, 2022.

3. On April 10, 2023, HAJI was indicted by a federal grand jury in this district in a two-count indictment, which alleges violations of Title 18 U.S.C. § 1951(a), Hobbs Act Robbery, and Title 18 U.S.C. § 924(c), Brandishing of a Firearm during a Crime of Violence.

**B. FACTUAL BASIS FOR AFFIDAVIT**

4. The facts in this affidavit come from my personal observations, my training and experience, my review of documents, and information obtained from other law enforcement agents and witnesses. This affidavit is intended to show merely that there is probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**C. PROBABLE CAUSE**

5. On December 7, 2022, the Milwaukee Police Department responded to 3205 N. Breman Street, Milwaukee, Wisconsin, for an armed robbery of a United States postal mail carrier, hereinafter referred to as E.V. E.V. stated that at approximately 3:00 p.m., he had just finished delivering mail to 3219 N. Breman Avenue and was walking south towards the next block when he passed two subjects who were walking northbound on the west sidewalk. E.V. stated that after they had passed, he could hear running footsteps approaching him from behind and he turned around. The same two subjects that had just passed him, ran up to him and one had a gun pointed at him.

6. E.V. stated that Suspect #1 said "Gimme everything..gimme everything...gimme everything," while pointing a small framed semi-automatic hand

gun at him. E.V. stated that he provided his ID and keys that were on a lanyard around his neck as well as the mail in his hands. E.V. stated that the key fob for the postal van as well as his arrow key were on the key ring that was provided. The Arrow key was specifically assigned to E.V. that day and can open the blue mailboxes and some boxes at apartment buildings. E.V. stated that the serial number for the key provided was #30411. E.V. stated that Subject #2 took the ID with the keys attached but dropped the mail E.V. had handed to him. E.V. stated that he attempted to hand the Subjects his mail bag because it had scanned devices within the bag that could be GPS located, however, the subjects were not interested and were only interested in the lanyard and keys. E.V stated that he then ran to a corner bar for safety and called the police. E.V stated that the subjects ran southbound and heard a car squeal off in a hurry.

7. Shortly after the incident, a witness approached him and told him that he saw the suspects get into a white Nissan Murano. That particular witness could not stay on scene, however, an additional witness also came forward and stated that they had observed the robbery and corroborated that she, too, had observed the suspects enter a white Nissan Murano.

8. A canvas for video surveillance was completed and video surveillance from a Ring doorbell was obtained at 3219 N. Breman Street. After a review of the video, Subject #1 was observed to be a black, male, late teens, approximately 5'10", thin build, dark complected, wearing a black hoody, black mask (above eyes showing), light gray



pants, black shoes, armed with a black semi-automatic handgun. Suspect #2 was observed to be a black, male, late teens, approximately 6'0" tall, thin build, medium complexion, wearing a black hoody, black mask (above eyes showing), black pants, white shoes, unknown if armed.

9. On January 25, 2023, a state residential search warrant related to a drug investigation was executed at 2519 N. Buffum Street, Milwaukee, Wisconsin. Prior to the execution, two black males, and two black females were observed leaving the residence in a blue Toyota Camry. Shortly thereafter and just prior to the warrant execution, the blue Toyota returned with two of the four individuals inside. When officers approached the vehicle, they identified the individuals as MARVIN TURNER (dob: XX/XX/2000) and HUSSEIN A. HAJI (dob: XX/XX/2001). Officers then executed the search warrant and identified HURIA H. ABU (dob: XX/XX/2002), JESSIE L. COOK (dob: XX/XX/2001), AMAURIE D. SMITH (dob: XX/XX/2005) as well as two females who were not residents of the house, hereinafter "S. J". and "S. W.". A search of the residence resulted in the recovery of a Glock 19 handgun (stolen out of Cudahy), a loaded Ruger P95 handgun, a loaded Ruger PC Charger carbine pistol, a loaded AK 7.62 cal pistol, which matched the description of the firearm used in the December 7, 2022 robbery, a GSG rifle upper with mock silencer, hundreds of pieces (approximately 900 checks) of stolen mail including personal and commercial checks from Milwaukee, Shorewood, Brookfield, Brown Deer, as well as others, checks currently being "washed" in acetone,

keys on a bed located in a bedroom that unlocked a safe which contained 7K, (2) USPS arrow keys, (20) cellular telephones, and (2) laptop computers. The arrow key stolen in the December 7, 2022, as well as another postal robbery, were recovered. Officers also located keys for a Nissan Murano that unlocked a white Nissan Murano parked outside the residence and matched the vehicle description used in the December 7, 2022, robberies.

10. Following the arrests of HAJI, COOK, ABU, SMITH and TURNER, interviews were conducted. During the interview of HAJI, HAJI stated to Detectives that he was the owner of an Apple purple iPhone 14, no case, with a passcode of "61923" or "all zeroes", and a yellow-colored Apple iPhone XR, with a cracked screen, telephone number 262-364-4059 and a passcode of "2900". HAJI stated that his service provider is T-Mobile and that he has had that cellular number for a couple of months. During the interview, HAJI admitted to Detectives that he had participated in the robbery of the mail carrier that had occurred on December 7, 2022. HAJI stated that he was armed with a black 9mm Glock firearm and that he and COOK approached the mailman. HAJI stated that COOK also had a gun. HAJI stated that ABU had been the driver of the Nissan Murano they used. HAJI stated that COOK demanded the mailman's property, and that he (HAJI) took the metal chain with the arrow key from the mailman. HAJI also admitted to Detectives that they were after the specific arrow key that mail carriers carry during the robbery. HAJI stated that HAJI, COOK, and ABU participate in "mail runs", which

are when a person removes mail from mailboxes. HAJI stated that he has participated in approximately 40 mail runs in at least four different vehicles. HAJI stated that the target of the mail runs are personal and commercial checks and that they sell them. HAJI stated that one of the methods of payment when selling the checks was CashApp. HAJI stated that the day he was arrested, he was taken into custody outside of the residence because he had been inside the Toyota. Haji stated that his firearm was located inside the Toyota on the passenger side floorboard. HAJI stated that he had owned the firearm for approximately one year and had purchased it at the Shooter's club. HAJI stated that the last time he shot the gun was on New Year Eve outside the house of 2519 N. Buffum Street at midnight. HAJI stated that he had fired the gun into the air.

11. On February 2, 2023, a Wisconsin state search warrant was obtained for all the cellular phones seized during the search warrant executed at 2519 N. Buffum Street. A review of the phones indicated that FBI evidence item 1B1 and evidence item 1B2 were phones associated to HAJI. Evidence item 1B1 was described as an iPhone A2651 14 Pro Max, purple in color with no case with PIN code "000000". Evidence item 1B2 was described as an iPhone XR A1984, gold in color, with PIN code "2900". A review of evidence item 1B1 and 1B2, were consistent with photos and instant messages associated to HAJI. Numerous messages located within HAJI's phone indicated that HAJI had obtained an arrow key, was using the arrow key to open mailboxes, steal personal checks from unwilling victims, and re-writing the checks to bank accounts associated to

HAJI. Also, during the review of the phones, it was determined that HAJI used Facebook Account "Scamily Sain". The following was a message associated to HAJI's Facebook messenger:

Scamily Sain (money emoji): "Okay I'll ship 2 slips out for you today they will get thru by Thursday once they get to you wash the slip off and rewrite it your self before you atm Deposit it." 12/20/2022 10:51:14 AM (UTC-6)

Scamily Sain (money emoji): "I have the arrow keys to the collection box so I get these slips in daily." 12/20/2022 10:51:14 AM (UTC-6)

12. I know that the term "slips" to mean a stolen personal or commercial check written out by a victim sending to another through the mail. I also know that the phrase "washing the slip" means that the subject uses acetone to erase the name in the "To" line of the check in order to readdress the name to HAJI or another subject.

#### **D. CONCLUSION**

On or about January 27, 2023, a Forensic Investigator processed evidence, to include the Ruger PC Charger 9MM Pistol Carbine and drum style magazine Serial# 91362595, a Roman Arms Draco 7.62X49 AK47 Style rifle and magazine Serial# DF8833, German Sporting Goods GSG-16 22FR upper receiver of rifle Serial# B12273, Ruger P95DC 9MM Pistol and drum magazine Serial# 8113319, Glock 19 9MM Pistol and extended magazine Serial# BXRC736, Glock 19 19X 9MM Pistol and magazine Serial# BXGX210, for latent/trace DNA evidence at the MPD Forensic Lab. On or about March 14, 2023, DNA

swabs were also collected from the (2) USPS arrow keys that were recovered during the 2519 N. Buffum search warrant. The collected DNA swabs containing potential DNA evidence were placed on inventory. I will submit those swabs for DNA analysis to compare against HAJI's DNA; however, a Standard DNA sample from HAJI is necessary for the comparison.

13. Your affiant and/or another law enforcement officer involved in this investigation propose to use a buccal swab DNA kit to obtain the DNA exemplar of HUSSEIN A. HAJI until an adequate sample is obtained.

14. Based upon the aforementioned information, I believe that there is probable cause to believe that on the person known as HUSSEIN A. HAJI, in the Eastern District of Wisconsin, there is now concealed certain property, namely saliva and epithelial cells that are evidence of the crime of Hobbs Act Robbery, in violation of Title 18 U.S.C. § 1951(a), and Brandishing of a Firearm during a Crime of Violence, in violation of Title 18 U.S.C. § 924(c).

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